

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION**

ROBIN LEE LEGG AND BASIL R.  
LEGG, JR. ,

PLAINTIFFS,

vs.

PETERBILT OF ATLANTA, LLC, TAB  
TRUCKING, INC., AND TIMOTHY  
EARL ADAMS,

DEFENDANTS.

**C.A. NO. 0:24-CV-04165-MGL**

**DEFENDANTS TAB TRUCKING, INC.  
AND TIMOTHY EARL ADAMS' RULE  
26(A)(2)(B) IDENTIFICATION  
OF EXPERTS**

Pursuant to Rule 26(a)(2)(B), Federal Rules of Civil Procedure, the Defendants Tab Trucking, Inc. and Timothy Earl Adams certify that the written report prepared and signed by the expert below have been disclosed to all other parties and that the reports comply with the requirements of Rule 26(a)(2)(B). Defendants Tab Trucking, Inc. and Timothy Earl Adams reserves the right to supplement the reports as required by Rule 26(e), if necessary, as discovery progresses in this matter.

In addition to any experts identified by the Plaintiffs Robin Lee Legg and Basil R. Legg, Jr. and co-Defendant Peterbilt of Atlanta, LLC, all witnesses identified in discovery, and those individuals identified in Plaintiffs' medical records, and Plaintiffs' medical providers, the Defendant Tab Trucking, Inc. identifies the following retained experts:

- a. James I. Middleton, Jr. P.E.  
Engineering Design & Testing Corp.  
P. O. Box 8027  
Columbia, SC 29202

Mr. Middleton is an accident reconstruction expert. Mr. Middleton's report is being provided to counsel for Plaintiffs and co-Defendant on this date.

Mr. Middleton based his opinions on his investigation and examination the accident site; the discovery exchanged in this lawsuit; the investigation(s) conducted by the law enforcement officer; the statements of the parties and witnesses; any deposition testimony; and his own expertise, training, education and background.

Mr. Middleton will utilize as exhibits any and all pleadings, documents, photographs, and other information produced (or to be produced) by all parties to this litigation, and any and all documents, reports, photographs and other information gathered by him during the course of his review.

Mr. Middleton's qualifications and publications, fee schedule and a listing of cases for which he has been a witness are attached.

b. Lindsay M. Oleson, P.E., ACTAR  
Engineering Design & Testing Corp.  
P. O. Box 8027  
Columbia, SC 29202

Ms. Oleson is a biomechanical expert. She prepared an Affidavit referenced in Mr. Middleton's report and provided to counsel for Plaintiffs and co-Defendant as set forth in section 'b' hereinabove.

Ms. Oleson's qualifications and publications, fee schedule and a listing of cases for which she has been a witness are attached.

c. Pursuant to Rule 26(a)(2)(C), FRCP, Defendants hereby identify the following treating physicians who will provide testimony on Plaintiff Robin Legg's medical care, treatment, diagnosis, impairments, and future medical treatment:

1. Dr. Samuel Davis, MD  
Dr. Wilson Van Dam, MD  
Dr. James Loging, MD  
Palmetto Bone and Joint, PA  
104 Ellett Road  
Chapin, South Carolina 29036
2. Matthew Whitaker, DPT, OCS  
Mark Blazek, DPT, OCS  
Chapin Rehabilitation Clinic, Inc.  
P.O. Box 337  
Chapin, South Carolina 29036
3. Kelby Hutcheson, MD  
Carolina Physicians and Rehab/Carolinas Center for Advanced Management of Pain  
7021 St Andrews Rd, Suite 1  
Columbia, SC 29212
4. Steven C. Poletti, M.D.  
Southeastern Spine Institute and Ambulatory Surgery Center  
1625 Hospital Drive  
Mt. Pleasant, SC 29464
5. Chris Lehmann, D.C.  
Lehmann Chiropractic  
425C Lexington Ave.  
Chapin, SC 29036
6. Any other medical providers identified in Plaintiff Robin Legg's medical records.

GENERAL RESERVATIONS

Defendants Tab Trucking, Inc. and Timothy Earl Adams reserve the right to call undesignated rebuttal expert witnesses whose testimony cannot reasonably be foreseen until the presentation of evidence against Defendants.

Defendants Tab Trucking, Inc. and Timothy Earl Adams anticipate that some of the fact witnesses and/or expert witnesses disclosed will be called upon to testify at trial by videotape and others may be called upon to testify live at trial.

Defendants Tab Trucking, Inc. and Timothy Earl Adams reserve the right to supplement the above designations based upon further discovery and productions.

Defendants Tab Trucking, Inc. and Timothy Earl Adams reserves the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate the same as a consulting expert who cannot be called by opposing counsel.

Defendants Tab Trucking, Inc. and Timothy Earl Adams reserves the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material issues of fact, and which would not violate any existing court order or the Federal Rules of Civil Procedure.

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Dated: November 27, 2024